Federal Communications Commission Washington, D. C. 20554

1 1

Approved by OMB 3060-0627 Expires 01/31/98

FOR FCC USE		
USE		

FCC 302-AM APPLICATION FOR AM BROADCAST STATION LICENSE

(Please read instructions before filling out form.

FOR COMMISSION USE ONLY	
FILE NO. BMML-20100727 HYX	

	0 7.10	1700 0 101	1
SECTION I - APPLICANT FEE INFORMATION			
PAYOR NAME (Last, First, Middle Initial)			
Saga Broadcasting, LLC			
MAILING ADDRESS (Line 1) (Maximum 35 characters) 73 Kercheval Avenue			
MAILING ADDRESS (Line 2) (Maximum 35 characters)			***************************************

CITY Grosse Pointe Farms	STATE OR COUNTRY (if for MI	eign address)	ZIP CODE 48236
TELEPHONE NUMBER (include area code) 313-886-7070	CALL LETTERS KPUG	OTHER FCC IDE 58887	NTIFIER (If applicable)
2. A. Is a fee submitted with this application?		******	✓ Yes No
B. If No, indicate reason for fee exemption (see 47 C.F.R. Section			
Governmental Entity Noncommercial educa	ofice of the control	ner (Please explain	۸٠
Noncommercial educa	ational licensee [] Of	iei (Fiease expiaii)	<i>)</i> .
C. If Yes, provide the following information:			
Enter in Column (A) the correct Fee Type Code for the service you a			
Fee Filing Guide." Column (B) lists the Fee Multiple applicable for this	s application. Enter fee amoun	t due in Column (C	.).
(A)	(0)		
(A) (B)	(C) FEE DUE FOR FEE		
FEE TYPE FEE MULTIPLE	TYPE CODE IN COLUMN (A)		FOR FCC USE ONLY
M M R 0 0 0 1	\$615.00		
To be used only when you are requesting concurrent actions which resi	ult in a requirement to list more	than one Fee Tyr	ne Code
		s than one ree ryp	e code.
(A) (B)	(C)		FOR FCC USE ONLY
M O R 0 0 1	\$ _{705.00}		
,			
	TOTAL AMOUNT		
ADD ALL AMOUNTS SHOWN IN COLUMN C, AND ENTER THE TOTAL HERE.	REMITTED WITH THI APPLICATION	s	FOR FCC USE ONLY
THIS AMOUNT SHOULD EQUAL YOUR ENCLOSED	\$1,320.00		
REMITTANCE.			

SECTION II - APPLICAN	T INFORMATION		In manufacture			
NAME OF APPLICANT Saga Broadcasting, LLC						
MAILING ADDRESS 73 Kercheval Avenue						
CITY Grosse Pointe F	arms		STATE MI		ZIP CODE 48236	
2. This application is for:	Commercial AM Direct	 ctional	Noncomm	nercial on-Directional		
Call letters	Community of License	Construct	ion Permit File No.	Modification of Construction Permit File No(s).	Expiration Date of L Construction Permit	
KPUG	Bellingham, WA	NA		NA	NA NA	
3. Is the station no accordance with 47 C.F		to auto	matic program	test authority in	Exhibit No.	No
4. Have all the terms construction permit been	s, conditions, and oblig n fully met?	jations s	et forth in the	above described	Yes Exhibit No.	No
If No, state exceptions in	n an Exhibit.				N/A	
Apart from the chang the grant of the underl representation contained	ying construction permi	t which \	would result in	any statement or	Yes	No
If Yes, explain in an Exl	hibit.				Exhibit No. N/A	
6. Has the permittee fil certification in accordance		•	•	ership	Yes December of	No
If No, explain in an Exhil	bit.				Does not a	эріу
7. Has an adverse find or administrative body w criminal proceeding, brofelony; mass media reanother governmental u	with respect to the applic bught under the provision elated antitrust or unfa	ant or pans of any	rties to the appli law relating to t	cation in a civil or he following: any	Yes V	No
If the answer is Yes, a involved, including an id (by dates and file numinformation has been required by 47 U.S.C. Sof that previous submissible call letters of the stream was filed, and the date of	lentification of the court bers), and the disposition earlier disclosed in contection 1.65(c), the application by reference to the ation regarding which the	or admin on of the nnection cant need file num ne applic	istrative body are litigation. Whe with another and only provide: (ber in the case ation or Section	nd the proceeding nere the requisite application or as i) an identification of an application, a 1.65 information	Exhibit No.	

8. Does the applicant, or any party to the application, have a the expanded band (1605-1705 kHz) or a permit or license expanded band that is held in combination (pursuant to the 5 with the AM facility proposed to be modified herein?	or				
If Yes, provide particulars as an Exhlbit.		Exhibit No.			
The APPLICANT hereby waives any claim to the use of any against the regulatory power of the United States because requests and authorization in accordance with this application amended).	use of the same, wheth	ner by license or otherwise, and			
The APPLICANT acknowledges that all the statements mad material representations and that all the exhibits are a material					
CERTIFIC	ATION				
1. By checking Yes, the applicant certifies, that, in the case of an individual applicant, he or she is not subject to a denial of federal benefits that includes FCC benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. Section 862, or, in the case of a non-individual applicant (e.g., corporation, partnership or other unincorporated association), no party to the application is subject to a denial of federal benefits that includes FCC benefits pursuant to that section. For the definition of a "party" for these purposes, see 47 C.F.R. Section 1.2002(b).					
2. I certify that the statements in this application are true, complete, and correct to the best of my knowledge and belief, and are made in good faith.					
Name Michael Williams	Signature				
^{Τitle} Vice President	Date 7/22/2010	Telephone Number (360) 734-9790			

WILLFUL FALSE STATEMENTS ON THIS FORM ARE PUNISHABLE BY FINE AND/OR IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001), AND/OR REVOCATION OF ANY STATION LICENSE OR CONSTRUCTION

FCC NOTICE TO INDIVIDUALS REQUIRED BY THE PRIVACY ACT AND THE PAPERWORK REDUCTION ACT

The solicitation of personal information requested in this application is authorized by the Communications Act of 1934, as amended. The Commission will use the information provided in this form to determine whether grant of the application is in the public interest. In reaching that determination, or for law enforcement purposes, it may become necessary to refer personal information contained in this form to another government agency. In addition, all information provided in this form will be available for public inspection. If information requested on the form is not provided, the application may be returned without action having been taken upon it or its processing may be delayed while a request is made to provide the missing information. Your response is required to obtain the requested authorization.

Public reporting burden for this collection of information is estimated to average 639 hours and 53 minutes per response, including the time for reviewing instructions, searching existing data sources, gathering and mainteining the data needed, and completing and reviewing the collection of information. Comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden, can be sent to the Federal Communications Commission, Records Management Branch, Paperwork Reduction Project (3060-0627), Washington, D. C. 20554. Do NOT send completed forms to this address.

THE FOREGOING NOTICE IS REQUIRED BY THE PRIVACY ACT OF 1974, P.L. 93-679, DECEMBER 31, 1974, 6 U.S.C. 552a(e)(3), AND THE PAPERWORK REDUCTION ACT OF 1980, P.L. 96-511, DECEMBER 11, 1980, 44 U.S.C. 3507.

Name of Applican	IL					
1	asting , LLC					
L	JTHORIZATION APPLIED FOR	: (chook ana)				
		(check one)				
	tation License	Direct Me	easurement of Power	(Metho	od of Moment	s)
	prized in construction permit	T				
	File No. of Construction Permit (if applicable)	Frequency (kHz)	Hours of Operation			kilowatts
KPUG	(ii applicable)	1170	ULN		Night 5.0	Day 10.0
2. Station location	n					
State			City or Town			
AW	Bellingham					
3. Transmitter loc	ation					
State	County		City or Town		Street address	
AW	Whatcom		Bellingham		(or other identification	•
4. Main studio loc	cation]		2340 E. Sun	set Drive
State County City or Town Street address						
WA	Whatcom	Bellingham		(or other identification	,	
5. Remote control	I point location (specify only if a	ith origonal alice ation			2219 Yew St	reet Road
į.	County	unorizea airectic			Street address	
WA	·		(or other identification			
WA Whatcom Bellingham 2219 Yew Street Road						
		nt heen installed				
6. Has type-appro	oved stereo generating equipmenting system meet the requireme		?		2219 Yew St	es X No
6. Has type-appro	oved stereo generating equipme		?		Y0	es X No
6. Has type-appro 7. Does the sample	oved stereo generating equipme	nts of 47 C.F.R.	? Section 73.68?		X YO Exhi	es No
6. Has type-appro 7. Does the sample Attach as an Exh 8. Operating cons	oved stereo generating equipmenting system meet the requirementibility and the detailed description of the stants:	nts of 47 C.F.R. sampling syster	? Section 73.68? n as installed.		X You have a second of the sec	es No Not Applicable bit No. Rpt
6. Has type-appro 7. Does the sample Attach as an Exh 8. Operating const	oved stereo generating equipmenting system meet the requirementibility and the description of the stants: or antenna current (in amperes)	nts of 47 C.F.R. sampling syster	? Section 73.68?	ystem	X You Exhit Eng	es No Not Applicable bit No. Rpt
6. Has type-appro 7. Does the sample Attach as an Exh 8. Operating const RF common point modulation for nigh	oved stereo generating equipmenting system meet the requirementibility and the detailed description of the stants: or antenna current (in amperes) the system	nts of 47 C.F.R. sampling syster	RF common point or modulation for day s	ystem 14	X You Exhit Engrent (in ampere	es X No es No Not Applicable bit No. Rpt s) without
6. Has type-appro 7. Does the sample Attach as an Exh 8. Operating const RF common point of modulation for night Measured antenna operating frequency	oved stereo generating equipmenting system meet the requirementibility a detailed description of the stants: or antenna current (in amperes) the system 10.4 a or common point resistance (in cy	nts of 47 C.F.R. sampling syster	RF common point or modulation for day s Measured antenna coperating frequency	ystem 14 or common	Exhi Eng	es X No es No Not Applicable bit No. Rpt s) without
6. Has type-appro 7. Does the sample Attach as an Exh 8. Operating const RF common point modulation for nigh Measured antenna operating frequence Night	oved stereo generating equipmenting system meet the requirementibility a detailed description of the stants: or antenna current (in amperes) and the system 10.4 a or common point resistance (in cy Day	nts of 47 C.F.R. sampling syster	RF common point or modulation for day s Measured antenna coperating frequency Night	ystem 14 or common	Exhi Eng	No
6. Has type-appro 7. Does the sample Attach as an Exh 8. Operating consi RF common point of modulation for night Measured antenna operating frequence Night 50	oved stereo generating equipmenting system meet the requirementibility a detailed description of the stants: or antenna current (in amperes) or antenna current (in amperes) or antenna current (in amperes) or common point resistance (in cy Day 45.3	nts of 47 C.F.R. sampling syster	RF common point or modulation for day s Measured antenna coperating frequency	ystem 14 or common	Exhi Eng	No
6. Has type-appro 7. Does the sample Attach as an Exh 8. Operating consi RF common point of modulation for night Measured antenna operating frequence Night 50	oved stereo generating equipmenting system meet the requirementibility a detailed description of the stants: or antenna current (in amperes) and the system 10.4 a or common point resistance (in cy Day	nts of 47 C.F.R. sampling syster without ohms) at	RF common point or modulation for day s Measured antenna coperating frequency Night	system 14 or common	Exhi Eng	No
6. Has type-appro 7. Does the sample Attach as an Exh 8. Operating consi RF common point of modulation for night Measured antenna operating frequence Night 50	oved stereo generating equipment of the stants: or antenna current (in amperes) that system 10.4 a or common point resistance (in cy Day 45.3 as for directional operation Antenna in Phase reading (in property)	nts of 47 C.F.R. sampling syster without ohms) at	RF common point or modulation for day s Measured antenna coperating frequency Night	system 14 or common	Exhi Eng	No
6. Has type-appro 7. Does the sample Attach as an Exh 8. Operating const RF common point of modulation for night Measured antenna operating frequency Night 50 Antenna indication: Towers	oved stereo generating equipment of the stants: or antenna current (in amperes) that system 10.4 a or common point resistance (in cy Day 45.3 as for directional operation Antenna of the system Phase reading of the system Night	nts of 47 C.F.R. sampling syster without ohms) at	RF common point or modulation for day s Measured antenna coperating frequency Night O Antenna monitor s current ratio(s Night	system 14 or common	Exhi Eng	No
6. Has type-appro 7. Does the sample Attach as an Exh 8. Operating const RF common point of modulation for nigh Measured antenna operating frequency Night 50 Antenna indication: Towers 1 (W) (103)	oved stereo generating equipment of the stants: or antenna current (in amperes) and the system and the system are common point resistance (in a pay a system and the system are common point resistance (in a pay a system are common point resistance (in a pay a system are common point resistance (in a pay a system are common point resistance (in a pay a system are common point resistance (in a pay a system are common point resistance (in a pay a system are common point resistance (in a pay a system are common point resistance (in a pay a system are common point resistance (in a pay a system are common point resistance (in a pay a system are common point resistance (in a pay a system are common point resistance (in a pay a system are common point resistance (in a pay a system are common point resistance (in a pay a system are common point resistance (in a pay a system are common point resistance (in a pay a system are common point resistance (in a pay a system are common point resistance (in a pay a system are common point resistance (in a pay a system are common point resistance (in a pay a system are common point resistance (in a pay a system are common point resistance (in a pay a system are common point resistance (in a pay a system are common point resistance (in a pay a system are common point resistance (in a pay a system are common point resistance (in a pay a system are common point resistance (in a pay a system are common point resistance (in a pay a system are common point resistance (in a pay a system are common point resistance (in a pay a system are common point resistance (in a pay a system are common point resistance (in a pay a system are common point resistance (in a pay a system are common point resistance (in a pay a system are common point resistance (in a pay a system are common point resistance (in a pay a system are common point resistance (in a pay a system are common point resistance (in a pay a system are common point resistance (in a pay a system are common point resistance (in a pay a	sampling syster without ohms) at	RF common point or modulation for day s Measured antenna coperating frequency Night 0 Antenna monitor s current ratio(s Night 0.355	system 14 or common sample s)	Exhi Eng Current (in ampere . 9 point reactance (in Day 121.1	No No No No No No No No Applicable bit No. Rpt s) without n ohms) at
6. Has type-appro 7. Does the sample Attach as an Exh 8. Operating construction RF common point of modulation for night Measured antenna operating frequency Night 50 Antenna indication: Towers	poved stereo generating equipment of the stants: or antenna current (in amperes) and the system and the system are common point resistance (in cy and the system are common point resistance (in cy and the system are common point resistance (in cy and the system are common point resistance (in cy and the system are common point resistance (in cy and the system are common point resistance (in cy and the system are common point resistance (in cy and the system are common point resistance (in cy and the system are common point resistance (in cy and the system are common point resistance (in cy and the system are common point resistance (in cy and the system are common point resistance (in cy and the system are cy and the	sampling syster without ohms) at	RF common point or modulation for day s Measured antenna coperating frequency Night 0 Antenna monitor s current ratio(s Night 0.355 1.000	system 14 or common sample s)	Exhi Eng Current (in ampere . 9 point reactance (in Day 121.1	No No No No No No No No Applicable bit No. Rpt s) without n ohms) at
6. Has type-appro 7. Does the sample Attach as an Exh 8. Operating const RF common point of modulation for nigh Measured antenna operating frequency Night 50 Antenna indication: Towers 1 (W) (103) 2 (C) (103)	poved stereo generating equipment of the stants: or antenna current (in amperes) and the system and the system are common point resistance (in cy and the system are common point resistance (in cy and the system are common point resistance (in cy and the system are common point resistance (in cy and the system are common point resistance (in cy and the system are common point resistance (in cy and the system are common point resistance (in cy and the system are common point resistance (in cy and the system are common point resistance (in cy and the system are common point resistance (in cy and the system are common point resistance (in cy and the system are common point resistance (in cy and the system are cy and the	sampling syster without ohms) at	RF common point or modulation for day s Measured antenna coperating frequency Night 0 Antenna monitor s current ratio(s Night 0.355	system 14 or common sample s)	Exhi Eng Current (in ampere . 9 point reactance (in Day 121.1	No No No No No No No No Applicable bit No. Rpt s) without n ohms) at
6. Has type-appro 7. Does the sample Attach as an Exh 8. Operating const RF common point of modulation for nigh Measured antenna operating frequency Night 50 Antenna indication: Towers 1 (W) (103) 2 (C) (103)	poved stereo generating equipment of the stants: or antenna current (in amperes) and the system and the system are common point resistance (in cy and the system are common point resistance (in cy and the system are common point resistance (in cy and the system are common point resistance (in cy and the system are common point resistance (in cy and the system are common point resistance (in cy and the system are common point resistance (in cy and the system are common point resistance (in cy and the system are common point resistance (in cy and the system are common point resistance (in cy and the system are common point resistance (in cy and the system are common point resistance (in cy and the system are cy and the	sampling syster without ohms) at	RF common point or modulation for day s Measured antenna coperating frequency Night 0 Antenna monitor s current ratio(s Night 0.355 1.000	system 14 or common sample s)	Exhi Eng Current (in ampere . 9 point reactance (in Day 121.1	No No No No No No No No Applicable bit No. Rpt s) without n ohms) at

A e

SECTION III - Page 2

9. Description of antenna system ((f directional antenna is used, the information requested below should be given for each element of the array. Use separate sheets if necessary.)

	,				
Type Radiator (3) Uniform cross-section guyed steel	Overall height in meters of radiator above base insulator, or above base, if grounded.	Overall heigh above ground obstruction lig	l (without	Overall height in meter above ground (include obstruction lighting)	
tower	65.55	67	.0	68.1	Exhibit No.
Excitation	X Series	Shunt		J.,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	
Geographic coordinates tower location.	to nearest second. For direct	tional antenna	give coordinate	es of center of array. Fo	or single vertical radiator give
North Latitude 48	3 46	33 "	West Longitu	de 122	26 23
	ove, attach as an Exhibit furtl ver and associated isolation c		dimensions in	cluding any other	Exhibit No. None
Also, if necessary for a dimensions of ground sy	a complete description, attac rstem. No change in data c			f the details and	Exhibit No.
10. In what respect, if a permit?	ny, does the apparatus const	ructed differ fro	om that describ	ed in the application for	construction permit or in the
DNA					
	e change in antenna or commo sample loops & isol	•			
	the applicant in the capacity true to the best of my knowle			nave examined the fore	going statement of technical
Name (Please Print or T	ype)	3	Signature (ch	ck appropriate bex-belov	w)
Thomas S. Gort	on P.E.		_\00	2050	
Address (include ZIP Co	de)	[Date		
Hatfield & Daw 9500 Greenwood	son Consulting Engi Ave N	neers	July :	19, 2010	
Seattle, WA 98		[7	Геlephone No.	(Include Area Code)	
				20)6-783-9151
Technical Director			Registere	d Professional Engineer	г
Chief Operator			Technical	Consultant	
Other (specify)					

FCC 302-AM (Page 5) August 1995

HATFIELD & DAWSON CONSULTING ELECTRICAL ENGINEERS 9500 GREENWOOD AVE, N.

SEATTLE, WASHINGTON 98103

DAVID J. PINION, PE

Telephone (206) 783-9151 FACSIMILE (206) 789-9834 E-MAIL hatdaw@hatdaw.com

> JAMES B. HATFIELD, PE Paul W. Leonard, PE Consultants

Maury L. Hatfield, PE (1942-2009)

Engineering Report:

APPLICATION FOR STATION LICENSE

Proof of Performance

KPUG, 1170 kHz

10 kW Daytime 5 kW Nighttime DA-N

Facility ID 58887

Bellingham, Washington

SAGA Broadcasting, LLC, Inc

July 2010

BENJAMIN F. DAWSON III, PE THO MAS M. ECKELS, PE

ERIK C. SWANSON, PE THOMAS S. GORTON, PE MICHAEL H. MEHIGAN, EIT

STEPHEN S. LOCKWOOD, PE

Table of Contents

Purpose of Application

- ITEM 1 Tower Impedance Measurements and Model Verification
- ITEM 2 Derivation of Operating Parameters for Directional Antenna
- ITEM 3 Moment Method Model for Tower Driven Individually
- ITEM 4 Moment Method Model for Directional Array
- ITEM 5 Sampling System Measurements
- ITEM 6 Reference Field Strength Measurements
- ITEM 7 Direct Measurement of Power
- ITEM 8 Antenna Monitor and Sampling System

Appendix A - FCC Form 302

Purpose of Application

This Engineering Report is part of an application for Direct Measurement of Power by SAGA Broadcasting, LLC, licensee of KPUG-AM, Bellingham, WA.

Background

This station is in a valley surrounded by extremely rugged mountainous terrain in the direction of the pattern minima. Valid measurement of field strength has been a difficult task. Substantial development has taken place over the past 35 years and made duplicating the original measurements troublesome. This station has operated under several STAs due to monitor points being above specified limits. It was therefore decided that a Method of Moments Computer Model proof, as authorized by §73.151(c) of the Commission's rules was a more suitable option for the re-licensing of KPUG than a traditional partial proof of performance.

KPUG operates with a non-directional antenna daytime at a power of 10 kW and a three tower directional antenna for nighttime operation at a power of 5 kW.

Information is provided herein demonstrating that the directional antenna parameters for the licensed pattern have been determined in accordance with the requirements of section §73.151(c) of the Commissions Rules. The system has been adjusted to produce antenna monitor parameters within \pm 5 % of ratio and \pm 3° of phase of the modeled values, as required by the Rules.

All antenna and sample system measurements used in this report were taken undersigned the morning of February 9, 2010. The existing sample lines were found to be unacceptable, and were replaced during the week of July 12, 2010. The new sample lines were measured on July 15 2010.

Stephen S. Lockwood, P.E.

16 July 2010



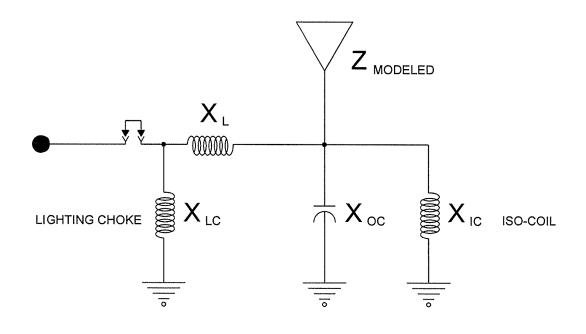
Hatfield & Dawson Consulting Engineers

ITEM 1 - Tower Impedance Measurements and Model Verification

Tower base Impedance measurements were made at the reference point at the output of the Antenna Tuning Units (ATUs). These measurements were made using an HP 8751A network analyzer, an ENI 403LA amplifier and custom manufactured directional couplers in a calibrated measurement system. The other towers within the array were in the open circuit condition (floated).

Standard electrical circuit calculations were used to relate the measured impedance ($Z_{ATU\,Measured}$) to the moment method base modeled impedance ($Z_{Modeled}$). X_L and X_C were calculated for the assumed stray base capacitance and lead inductance for each tower. The measured reactance for the sample loop iso-coil and the lighting choke are included in this model.

The modeled ($Z_{ATU\,Modeled}$) and measured ($Z_{ATU\,Measured}$) base impedance at each ATU output J-plug with the other towers open circuited at their ATU output J-plugs agree within \pm 2 ohm and \pm 4 % for resistance and reactance.



TOWER	$X_{LC}(\Omega)$	$X_L(\Omega)$	X _{oc} (Ω)	x _{ic} (Ω)	$Z_{MODELED}(\Omega)$	$Z_{ATU MODELED}(\Omega)$	$Z_{ATUMEASURED}(\Omega)$
TWR #1	+j2600	+j34.2	-j880	+j845	54.7 +j66.6	50.4 +j98	50.4 +j98
TWR #2	+j2600	+j64.0	-j1475	+j845	52.9 +j62.8	45.2 +j121.1	45.3 +j121.1
TWR #3	+j2600	+j38.8	-j1150	+845	54.7 +j66.6	48.5 +j101.8	48.5 +j101.8

Bob Allen, H&D

3/23/2010 10:28 AM

KPUG CIRCUIT MOM TABLE.dwg

PDF FILE: KPUG MOM TABLE.pdf

HATFIELD & DAWSON consulting engineers

ANALYSIS OF TOWER IMPEDANCE MEASUREMENTS TO VERIFY METHOD OF MOMENTS MODEL

RADIO STATION KPUG

03/2010

ITEM 2 - Derivation of Operating Parameters for Directional Antenna

The KPUG antenna previously used sample loops. These loops have been removed and replaced with Delta TCT-2 Toroidal Current Transformers. The isolation coils and sample loops have been removed¹. The matrix measurements were taken prior to the removal of the sample loops and isolation coils. The spice model has accounted for the removal of this component.

PSpice is an analog circuit simulator computer program. It calculates the voltages and currents of a circuit under a variety in different excitation circumstances, such as DC, AC, and in time using nodal and mesh analysis applications of Kirchhoff's laws (among other features). PSpice was used to model the circuit conditions around the tower bases to derive the antenna monitor parameters based on the tower base currents (magnitude and angle) calculated by the moment method model. The 1987 MicroSim release of this program was used.

Currents From MiniNEC

C:\AM\KPUG\Model\KPUG 06-29-2010 09:53:45 CURRENT rms Frequency = 1170 KHz Input power = 5,000. watts Efficiency = 100. % mag phase real imaginary (amps) 0 0 0 3.57495 266.8 -.199697 -3.56937 0 0 4.66667 3.9382 264.8 -.354808 -3.92218 0 0 9.33333 4.14621 263.8 -.450792 -4.12163 0 0 14. 4.29208 262.9 -.527105 -4.25959 0 0 18.6667 4.38683 262.3 -.588426 -4.34718 0 0 23.3333 4.43518 261.7 -.636716 -4.38924 0 0 28. 4.43965 261.3 -.67293 -4.38836 0 0 32.6667 4.40188 260.9 -.697636 -4.34625 0 0 37.3333 4.32321 260.5 -.711223 -4.2643 0 0 42. 4.20484 260.2 -.71403 -4.14377 0 0 0 46.6667 4.048 260. -706359 -3.98589 0 0 51.3333 3.85396 259.7 -.688538 -3.79195 0 0 65.3333 3.06217 259.1 -.577713 -3.00718 0 0 70. 2.73293 259. -.522914 -2.68243 0 0 74.6667 2.37308 259.5 -.522914 -2.68243 0 0 74.6667 2.37308 259.5 -.522914 -2.68243 coordinates in degrees no. GND 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 0 74.6667 2.37308 258.8 -.459796 -2.32811

¹While the three KPUG towers are of identical height and face width, they are not identical towers, the center tower having been installed many years after the two end towers. Because of the different cross-member construction of the center tower, the Commission's rules do not allow the use of a method of moments proof of performance using sample loops.

```
18
        0
                  0
                             79.3333
                                        1.98334
                                                  258.7 -.388628
                                                                     -1.94489
 19
        0
                  0
                                        1.56345
                                                  258.6
                             84.
                                                         -.309482
                                                                     -1.53251
 20
                                                          -.221938
        0
                   0
                             88.6667
                                        1.11083
                                                  258.5
                                                                     -1.08843
 21
        0
                   0
                             93.3333
                                         .616744
                                                  258.4
                                                          -.124297
                                                                     -.604089
END
        0
                  0
                             98.
                                        0
                                                  0
                                                          0
GND
        -23.1411
                  -63.5796
                                        8.63358
                                                                     .758571
                             0
                                                  5.
                                                          8.60019
                             4.66667
 23
        -23.1411
                  -63.5796
                                        8.92273
                                                  3.6
                                                          8.9051
                                                                     .560702
 24
        -23.1411
                  -63.5796
                                                  2.7
                             9.33333
                                        9.05306
                                                          9.04277
                                                                     .431483
 25
       -23.1411
                  -63.5796
                                        9.10226
                                                          9.09658
                             14.
                                                  2.
                                                                     .321346
 26
       -23.1411
                  -63.5796
                             18.6667
                                        9.07977
                                                  1.4
                                                          9.077
                                                                     .22448
 27
       -23.1411
                  -63.5796
                             23.3333
                                        8.98996
                                                  .9
                                                          8.98889
                                                                     .138528
 28
       -23.1411
                  -63.5796
                             28.
                                        8.83553
                                                  . 4
                                                                     .0624251
                                                          8.83531
 29
       -23.1411
                  -63.5796
                             32.6667
                                        8.61851
                                                  360.
                                                          8.61851
                                                                     -4.36E-03
 30
       -23.1411
                             37.3333
                  -63.5796
                                        8.34099
                                                  359.6
                                                          8.34076
                                                                     -.0620857
 31
       -23.1411
                  -63.5796
                             42.
                                        8.00501
                                                  359.2
                                                          8.00424
                                                                     -.11091
 32
       -23.1411
                  -63.5796
                             46.6667
                                        7.6128
                                                  358.9
                                                                     -.150907
                                                          7.6113
                                                                     -.182127
 33
       -23.1411
                  -63.5796
                             51.3333
                                        7.16658
                                                  358.5
                                                          7.16427
       -23.1411
 34
                  -63.5796
                             56.
                                        6.66888
                                                  358.2
                                                          6.66574
                                                                     -.204609
 35
                  -63.5796
       -23.1411
                             60.6667
                                        6.12224
                                                  358.
                                                          6.11835
                                                                     -.218389
                             65.3333
 36
       -23.1411
                  -63.5796
                                        5.52921
                                                  357.7
                                                          5.52469
                                                                     -.223508
 37
       -23.1411
                  -63.5796
                             70.
                                        4.89223
                                                  357.4
                                                          4.88728
                                                                     -.219999
 38
        -23.1411
                  -63.5796
                             74.6667
                                        4.21339
                                                  357.2
                                                          4.20826
                                                                     -.207885
       -23.1411
 39
                  -63.5796
                             79.3333
                                        3.49402
                                                  356.9
                                                          3.489
                                                                     -.187137
 40
       -23.1411
                  -63.5796
                                        2.73378
                             84.
                                                  356.7
                                                          2.72924
                                                                     -.157621
       -23.1411
 41
                  -63.5796
                             88.6667
                                        1.92839
                                                                     -.118906
                                                  356.5
                                                          1.92472
 42
       -23.1411
                  -63.5796
                             93.3333
                                        1.0631
                                                                     -.0697845
                                                  356.2
                                                          1.06081
END
       -23.1411
                  -63.5796
                             98.
                                        0
                                                  Ω
       -46.2822
GND
                  -127.159
                             0
                                        4.49865
                                                  103.1
                                                          -1.02103
                                                                     4.38125
 44
       -46.2822
                  -127.159
                             4.66667
                                        4.54838
                                                  102.6
                                                          -.994235
                                                                     4.43839
                                                          -.970335
 45
       -46.2822
                  -127.159
                             9.33333
                                        4.55149
                                                  102.3
                                                                     4.44685
       -46.2822
                  -127.159
 46
                             14.
                                        4.5237
                                                  102.
                                                          -.943373
                                                                     4.42424
       -46.2822
                  -127.159
                                                         -.912727
 47
                             18.6667
                                        4.46713
                                                  101.8
                                                                     4.37289
                                                         -.878256
                             23.3333
 48
       -46.2822
                  -127.159
                                        4.383
                                                  101.6
                                                                     4.29411
       -46.2822
                  -127.159
                                                          -.840001
 49
                             28.
                                        4.27221
                                                  101.3
                                                                     4.18882
 50
       -46.2822
                  -127.159
                             32.6667
                                        4.13563
                                                  101.1
                                                          -.798112
                                                                     4.05789
 51
       -46.2822
                  -127.159
                             37.3333
                                        3.97418
                                                  100.9
                                                          -.752815
                                                                     3.90223
 52
       -46.2822
                  -127.159
                                        3.78885
                                                  100.7
                                                          -.704394
                             42.
                                                                     3.72279
 53
       -46.2822
                  -127.159
                             46.6667
                                        3.58069
                                                  100.5
                                                          -.653162
                                                                     3.52061
 54
        -46.2822
                  -127.159
                             51.3333
                                        3.35084
                                                  100.3
                                                          -.599482
                                                                     3.29678
                                                          -.543742
       -46.2822
                  -127.159
 55
                             56.
                                        3.10053
                                                  100.1
                                                                     3.05248
 56
       -46.2822
                  -127.159
                             60.6667
                                        2.831
                                                  99.9
                                                          -.48635
                                                                     2.78891
 57
       -46.2822
                  -127.159
                             65.3333
                                                          -.427726
                                        2.54347
                                                  99.7
                                                                     2.50725
       -46.2822
                  -127.159
 58
                             70.
                                        2.23915
                                                  99.5
                                                          -.368288
                                                                     2,20866
 59
       -46.2822
                  -127.159
                             74.6667
                                        1.91906
                                                  99.2
                                                          -.308431
                                                                     1.89411
       -46.2822
 60
                  -127.159
                             79.3333
                                        1.58387
                                                  99.
                                                          -.248495
                                                                     1.56426
       -46.2822
                  -127.159
                             84.
                                                  98.8
                                                          -.188709
 61
                                        1.23351
                                                                     1.21899
 62
        -46.2822
                  -127.159
                             88.6667
                                         .866145
                                                  98.6
                                                          -.129052
                                                                     .856477
 63
        -46.2822
                  -127.159
                             93.3333
                                         .475326
                                                  98.3
                                                          -.0688602
                                                                    .470311
        -46.2822
                  -127.159
END
                             98.
                                         0
                                                  0
                                                          0
                                                                     0
```

Tower 1

Inp ut

```
## KPUG TOWER 1 BASE MODEL
.OPT LIST NOPAGE NODE NOMOD
.AC LIN 1 1170kHz 1170kHz
```

IIN	1	0	AC 10.132 143.13
rs	1	0	98.3
rs1	1	2	.001
L1	2	3	353.7uH
RL1	3	0	.001
L2	2	4	4.7uH
C1	4	0	154.6pF
LL	4	5	27.2uH
RL	5	0	73.0ohms

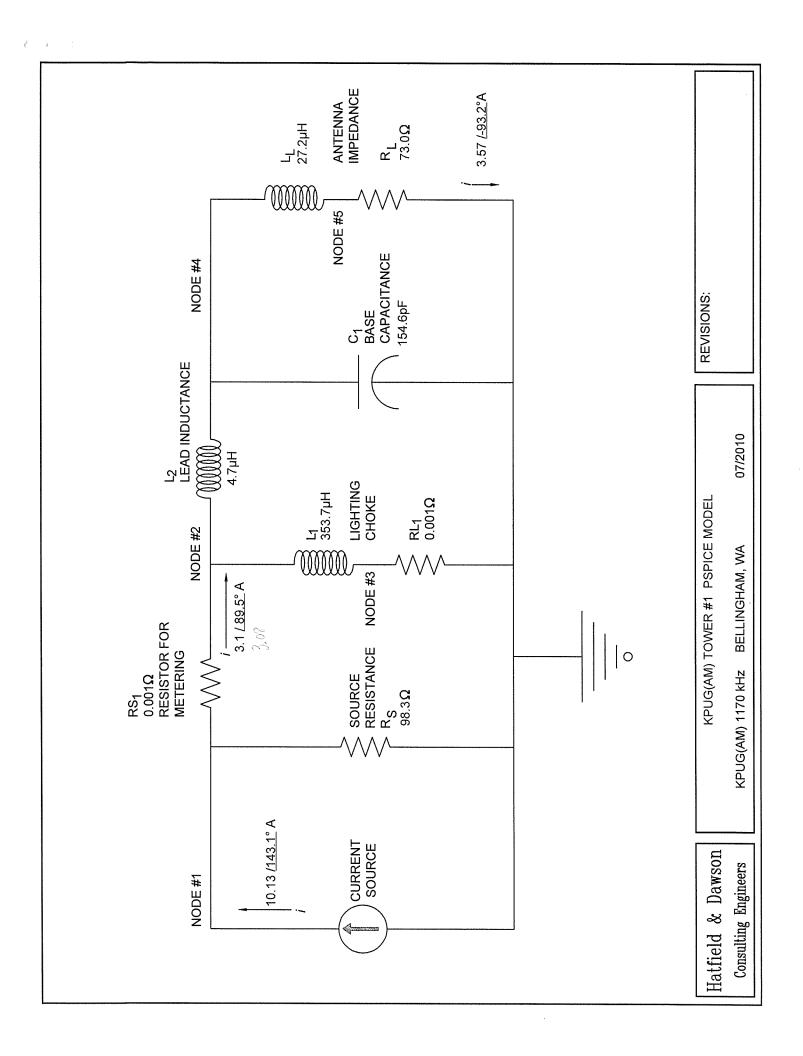
[.]PRINT AC VM(2,0) VP(2,0) VM(4,0) VP(4,0) .PRINT AC IM(L1) IP(L1) IM(L2) IP(L2)

Output

FREQ	IM(RS1)	IP(RS1)	IM(RL)	IP(RL)
1.170E+06	3.077E+00	-8.947E+01	3.570E+00	-9.320E+01

[.]PRINT AC IM(RS1) IP(RS1) IM(RL) IP(RL) ##.PROBE

[.]END



Tower 2

Inp ut

```
## KPUG TOWER 2 BASE MODEL
.OPT LIST NOPAGE NODE NOMOD
.AC LIN 1 1170kHz 1170kHz
```

IIN	1	0	AC 28.35 -121.7
rs	1	0	49.7
rs1	1	2	.001
L1	2	3	353.7uH
RL1	3	0	.001
L2	2	4	8.7uH
C1	4	0	92.2pF
LL	4	5	9.4uH
RL	5	0	50ohms

[.]PRINT AC VM(2,0) VP(2,0) VM(4,0) VP(4,0)

Output

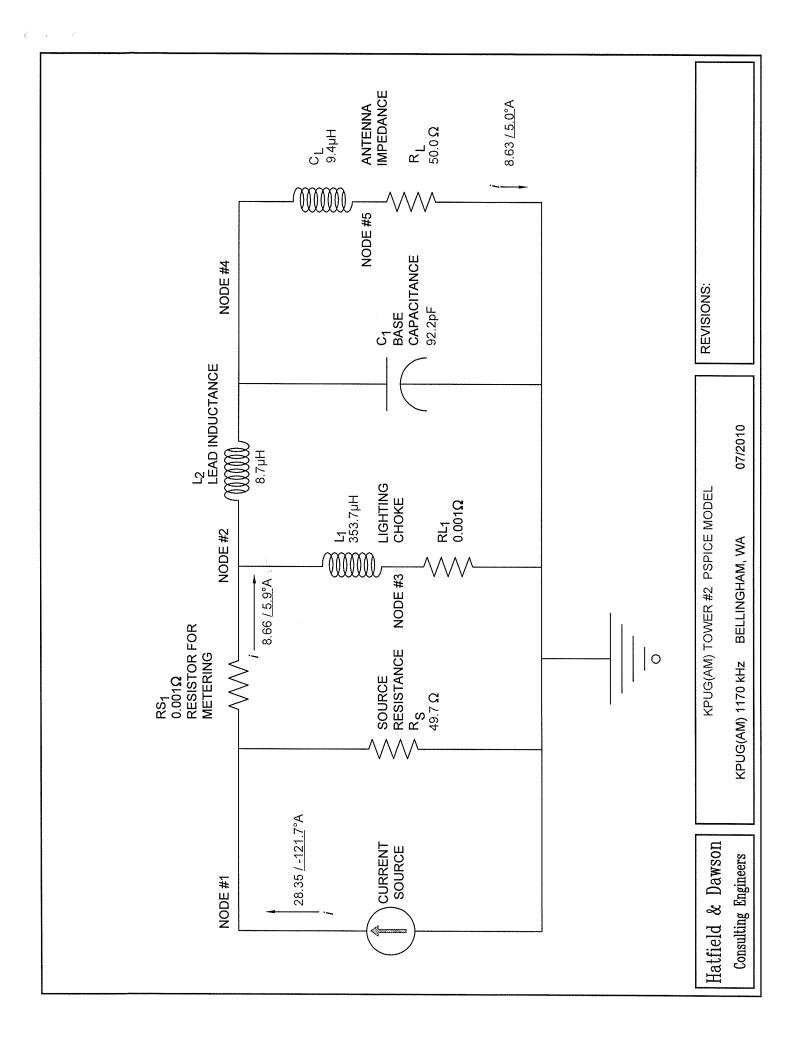
FREQ	IM(RS1)	IP(RS1)	IM(RL)	IP(RL)
1.170E+06	8.658E+00	5.933E+00	8.629E+00	5.048E+00

[.]PRINT AC IM(L1) IP(L1) IM(L2) IP(L2)

[.]PRINT AC IM(RS1) IP(RS1) IM(RL) IP(RL)

^{##.}PROBE

[.]END



Tower 3

Input

```
## KPUG TOWER 3 BASE MODEL
.OPT LIST NOPAGE NODE NOMOD
.AC LIN 1 1170kHz 1170kHz
```

IIN	1	0	AC 19.74 -13.6
rs	1	0	16.5
rs1	1	2	.001
L1	2	3	353.7uH
RL1	3	0	.001
L2	2	4	5.3uH
C1	4	0	118.3pF
LL	4	5	3.6uH
RL	5	0	16.6ohms

[.]PRINT AC VM(2,0) VP(2,0) VM(4,0) VP(4,0)

Output

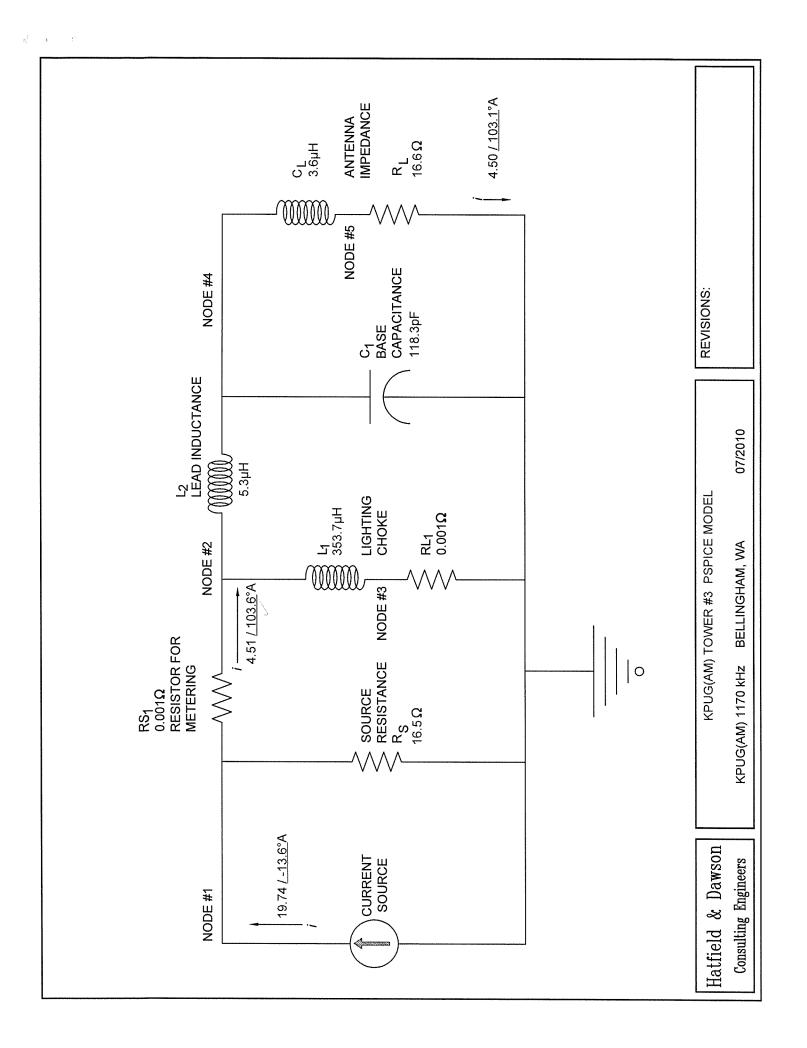
FREQ	IM(RS1)	IP(RS1)	IM(RL)	IP(RL)
1.170E+06	4.507E+00	1.036E+02	4.498E+00	1.031E+02

[.]PRINT AC IM(L1) IP(L1) IM(L2) IP(L2)

[.]PRINT AC IM(RS1) IP(RS1) IM(RL) IP(RL)

^{##.}PROBE

[.]END



Calculated Antenna Monitor Parameters

	Modeled Current Pulse		Current t TCT (Amps)	Antenna Moi	nitor Parameters
	Cultent Fulse	Magnitude	Phase (°)	Ratio	Phase (°)
Tower 1 West	Node 1	3.077	-89.5°	0.355	-95.4°
Tower 2 Center	Node 22	8.658	5.9°	1.000	0.0°
Tower 3 East	Node 43	4.507	103.6°	0.521	97.7°

ITEM 3- Moment Method Model for Tower Driven Individually

Expert MININEC Broadcast Professional Version 12.5 was used to model the KPUG array. The antenna model was adjusted to match the measured matrix impedances. The wire coordinates used are in electrical degrees and wire radius is in meters. The physical height of the triangular cross section towers is 80.4°, the face width is 24 inches. The following adjusted parameters were used:

- antenna electrical height on towers was adjusted to 106.4% of the physical height (98°)
- wire radius of 95.2% (0.20 meters) of the equivalent radius of the tower was used
- 21 segments per antenna element (4.7° per segment) were used

North Tower #1 Model

C:\AM\KPUG\Model\KPUG-ND 03-18-2010 14:39:38

KPUG Night

with the Co

GEOMETRY

Wire coordinates in degrees; other dimensions in meters Environment: perfect ground

Environment: perfect ground

wire	caps	Distance	Angle	Z	radius	segs
1	none	0	0	0	. 2	21
		0	0	98.		
2	none	67.66	110.	0	. 2	21
		67.66	110.	98.		
3	none	135.32	110.	0	. 2	21
		135.32	110.	98.		

Number of wires = 3 current nodes = 63

ELECTRICAL DESCRIPTION

Frequencies (KHz)

frequency no. of segment length (wavelengths) no. lowest step steps minimum maximum 1 1,170. 0 1 .012963 .012963

Sources

source nodesectormagnitudephasetype1110voltage

Lumped loads

inductance capacitance passive resistance reactance load node (ohms) (ohms) (mH) (uF) circuit 22 0 1 1.E+06 0 0 Ω 43 1.E+06 0 0 0 0

C:\AM\KPUG\Model\KPUG-ND 03-18-2010 14:39:38

IMPEDANCE

normalization = 50.

freq resist react imped phase VSWR S11 S12 (KHz) (ohms) (ohms) (ohms) (deg) dB dB source = 1; node 1, sector 1 1,170. 54.65 66.567 86.127 50.6 3.3292 -5.384 -1.4842

Center Tower #2 Model

C:\AM\KPUG\Model\KPUG-ND 03-18-2010 14:35:28

KPUG Night

 $V_{i,j} = V_{i,j} = V_{i,j}$

GEOMETRY

Wire coordinates in degrees; other dimensions in meters Environment: perfect ground

wire	caps	Distance	Angle	Z	radius	segs
1	none	0	0	0	. 2	21
		0	0	98.		
2	none	67.66	110.	0	.2	21
		67.66	110.	98.		
3	none	135.32	110.	0	.2	21
		135.32	110.	98.		

Number of wires $\begin{array}{rcl} \text{amber of wires} & = & 3 \\ & \text{current nodes} & = & 63 \end{array}$

	mini	mum	max	imum
Individual wires	wire	value	wire	value
segment length	1	4.66667	1	4.66667
radius	1	. 2	1	. 2

ELECTRICAL DESCRIPTION

Frequencies (KHz)

rrequ	lencies (KHZ)						
	frequency		no.	of	segment	length	(wavelengths)
no.	lowest	step	ster	s	minimum		maximum
1	1,170.	0	1		.012963		.012963

Sources

source	node	sector	magnitude	phase	type
1	22	1	1.	Ō	voltage

Lumpe	d loads	3				
load	node	resistance (ohms)	reactance (ohms)	inductance (mH)	capacitance (uF)	passive circuit
1	1	1.E+06	0	0	0	0
2	43	1.E+06	0	0	0	0

C:\AM\KPUG\Model\KPUG-ND 03-18-2010 14:36:15

IMPEDANCE

normalization = 50.freq resist react imped phase VSWR S11 S12

				F		~ ~ ~	~
(KHz)	(ohms)	(ohms)	(ohms)	(deg)		dВ	dB
source =	1; node	22, sect	or 1				
1,170.	52.989	62.784	82.156	49.8	3.1763	-5.6614	-1.376

South Tower #3 Model

KPUG Night

-1 A 1

GEOMETRY

Wire coordinates in degrees; other dimensions in meters ${\tt Environment:}$ perfect ground

wire	caps	Distance	Angle	Z	radius	segs
1	none	0	0	0	.2	21
		0	0	98.		
2	none	67.66	110.	0	.2	21
		67.66	110.	98.		
3	none	135.32	110.	0	. 2	21
		135.32	110.	98.		

Number of wires = 3 current nodes = 63

mınimum			max	imum
Individual wires	wire	value	wire	value
segment length	1	4.66667	1	4.66667
radius	1	. 2	1	. 2

ELECTRICAL DESCRIPTION

Frequencies (KHz)

	rrequency		no, or	segment	rength (waverengths)
no.	lowest	step	steps	minimum	maximum
1	1,170.	0	1	.012963	.012963

Sources

source	node	sector	magnitude	phase	type
1	43	1	1.	0	voltage

Lumped loads

		resistance	reactance	inductance	capacitance	passive
load	node	(ohms)	(ohms)	(mH)	(uF)	circuit
1	1	1.E+06	0	0	0	0
2	22	1.E+06	0	0	0	0

C:\AM\KPUG\Model\KPUG-ND 03-18-2010 14:41:01

IMPEDANCE

normalization = 50.

freq	resist	react	imped	phase	VSWR	S11	S12
(KHz)	(ohms)	(ohms)	(ohms)	(deg)		dВ	dВ
source	= 1; node	43, sect	or 1				

1,170. 54.65 66.566 86.126 50.6 3.3292 -5.3841 -1.4841

ITEM 4 - Moment Method Model for Directional Array

W 4

ITEM 4 - Moment Method Model for Directional Array					
Input File: C: \AM\KPUG\Model\KPUG	03-18-2010	14:02:06			
KPUG Night GEOMETRY Wire coordinates in de Environment: perfect g		dimensions	in mete	ers	
wire caps Distance 1 none 0	Angle 0	Z 0	rac .2	dius	segs 21
0 2 none 67.66 67.66	0 110. 110.	98. 0 98.	.2		21
3 none 135.32 135.32	110. 110. 110.	98. 98.	. 2		21
Number of wires current node	= 3 s = 63				
Individual wires segment length radius	minimum wire value 1 4.666 1 .2	67	max wire 1 1	value 4.66667	
ELECTRICAL DESCRIPTION Frequencies (KHz) frequency no. lowest step 1 1,170. 0	no.	_	m	n (wavele maximum .012963	ngths)
Sources source node sector 1 1 1 2 22 1 3 43 1	magnitude 1,076.23 1,041.84 198.538	phase 336.7 59.1 160.9		type voltage voltage voltage	
C:\AM\KPUG\Model\KPUG	03-18-2010	14:33:13			
IMPEDANCE normalization = 50. freq resist reac (KHz) (ohms) (ohm source = 1; node 1, s 1,170. 73.026 199.	t imped (s) (ohms) ector 1	(deg)	VSWR 13.018	S11 dB	S12 dB -5.7678
source = 2; node 22,	sector 1				
1,170. 50.039 69.1		54.1	3.6342	-4.9065	-1.6948
<pre>source = 3; node 43, 1,170. 16.645 26.3 C:\AM\KPUG\Model\KPUG</pre>	97 31.207	57.8 14:34:35	3.919	-4.5329	-1.8852
CURRENT MOMENTS (amp-de	grees) rms				
Frequency = 1170 KHz Input power = 5,000. w	atts	rtical cur	ront mon	nont	

Hatfield & Dawson Consulting Engineers

wire magnitude phase (deg) magnitude phase (deg)
1 322.446 261. 322.446 261.
2 632.247 0.0 632.247 0.0
3 303.479 101. 303.479 101.

vertical current moment

Medium wave array vertical current moment (amps-degrees) rms (Calculation assumes tower wires are grouped together. The first wire of each group must contain the source.)

magnitude	phase	(deg)
322.446	261.	
632.247	0.0	
303.479	101.	
	322.446 632.247	322.446 261. 632.247 0.0

yr White

8 W W

ITEM 5 - Sampling System Measurements

Measurements were made using a HP 8751A network analyzer, an ENI 403LA amplifier and custom manufactured directional couplers in a calibrated measurement system. The sample line was found to be series resonant (an odd multiple of 90° which is an impedance zero - very low resistance and zero reactance) around 873 kHz which is 90° for this length of transmission line. The characteristic impedance was calculated using the following formula, where $R_1 \pm jX_1$ and $R_2 \pm X_2$ are the measured impedances at the -45° and +45° offset frequencies:

$$Z_0 = \sqrt{\sqrt{R_1^2 + X_1^2} \cdot \sqrt{R_2^2 + X_2^2}}$$

The measured open circuit sample line impedances and characteristic impedance calculations are shown below:

Lines from ATUs to Transmitter Building

	Resonance Frequency (kHz)	-45° Offset Frequency (kHz)	-45° Offset Impedance (R, ± jX,) (Ohms)	+45° Offset Frequency (kHz)	+45° Offset Impedance (R ₂ ± jX ₂) (Ohms)	Characteristic Impedance (Z _g)
Sample Line 1 (Center Tower)	872.80	727.333	4.4 - j 50.6	1018.267	3.5 + j 50.1	50.5 ohms
Sample Line 2 (West Tower)	872.10	726.750	4.5 - j 50.6	1017.450	3.5 + j50.5	50.4 ohms
Sample Line 3 (East Tower)	873.40	727.833	4.5 - j 50.7	11018.967	3.5 + j 50.7	50.5 ohms

The sample line lengths calculated from the measurements above are:

Length in Electrical Degrees at 1170 kHz	Length from ATU to Transmitter Building	Measured Impedance (Z _S) With Sample Transformer Attached		
Sample Line 1	361.9°	50.2 - j 0.2 ohms		
Sample Line 2	362.2°	50.1 - j 0.2 ohms		
Sample Line 3	361.7°	50.2 - j 0.3 ohms		

ITEM 6 - Reference Field Strength Measurements

110° 1.25 km 70 mV/m 48° 46' 19.0" 122° 25' 30.2"

1 5 K

Stop Sign at Barkley Blvd & Tanglewood

110° 3.56 km 20 mV/m 48° 45' 54.2" 122° 23' 42.8"

End of pavement on E.17th Crest (south of Academy Rd) just past 3397 E. 17th Crest.

110° 6.72 km 3.0 mV/m 48° 45' 19.6" 122° 21' 16.9"

Center of parking lot of "The Fork" restaurant at North Shore Rd & Y Rd.

290° 2.13 km 290 mV/m 48° 46' 56.4" 122° 28' 5.9"

Mailbox for 1011 E. McLeod Rd. (West of James St. Rd.)

290° 3.95 km 110 mV/m 48° 47' 15.7" 122° 20' 30.0"

Stop Sign at SW corner of Bellis Fair Pkwy & Cordata Pkwy (north of Kohl's department store)

290° 5.17 km 100 mV/m

Fireplug in front of 102 Orchid Place (East of Aldrich Rd.)

KPUG reference coordinates: 48° 46' 32.6" 122° 26' 27.7"

All coordinates on this page are NAD83

All field strength readings were taken with a Potomac Instruments FIM-41, Serial No. 647 last calibrated in October 2008.

All coordinates were taken with a WAAS enabled GPS receiver with a stated accuracy of 2 meters.



ITEM 7 - Direct Measurement of Power

Common point impedance measurement were made using a HP 8751A network analyzer, an ENI 403LA amplifier and custom manufactured directional couplers in a calibrated measurement system. The measurements were made at the phasor cabinet input adjacent to the common point current meter that is used to determine operation power. The impedance measured at this point was adjusted to a value of $50 \pm j0$ for the directional antenna system.

The measured daytime non-directional impedance for tower #2 is 45.3 +j121.1 ohms.

ITEM 8 - Antenna Monitor and Sampling System

The sample system installed consists of Delta Electronics TCT-2 toroidal current transformers (TCT) installed inside the tuning houses at the base of each tower. All three TCTs were compared with each other on the bench using the Network Analyzer and found to be in good working order. The TCTs are connected to a Gorman-Redlich CMR digital antenna monitor by equal lengths of 1/2 inch Andrew LDF4-50A coaxial cable. This cable has a foam dielectric, and solid copper inner and outer conductors. These lines were verified to have equal electrical lengths. All excess cable is neatly coiled in the basement of the transmitter building. The antenna monitor was tested with a signal generator, a Tee connector and equal lengths of cable. The two signals were fed into the reference and sample inputs and the monitor was found to be in good working order. This antenna monitor has been serviced and calibrated at the factory within the last two years. There is no change to the ground system, the description contained in the current station license remains accurate.